

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA
ROME DIVISION

IN RE: ANGELA K. CHAMBERS,	{	CHAPTER 13
	{	
DEBTOR(S)	{	CASE NO. R20-41834-BEM
	{	
	{	JUDGE ELLIS-MONRO

OBJECTION TO CONFIRMATION

COMES NOW Mary Ida Townson, TRUSTEE herein, and objects to Confirmation of the plan for the following reasons:

1. The Debtor(s)' payments under the proposed plan are not current.
2. The Plan as proposed will extend beyond sixty (60) months, contrary to 11 U.S.C. Section 1322(d). (77 months).
3. The Debtor(s) has proposed to make payments directly to the Trustee but should be required to have them remitted by payroll deduction.
4. The voluntary petition fails to reflect the additional spelling of Debtor's first name as Angelia as listed on her social security card.
5. The Debtor(s)' Schedule I fails to accurately reflect payroll taxes and other deductions thereby preventing the Chapter 13 Trustee from determining the feasibility of the proposed plan, in violation of 11 U.S.C. Section 11 U.S.C. Section 1325 (a)(6).
6. The proposed Chapter 13 plan should be amended to treat the secured claim of the Georgia Department of Revenue under Section 3.2.
7. The schedules provide that Georgia Department of Revenue and the Internal Revenue Service have a secured or priority claim(s); however, the Chapter 13 Plan fails to provide for said creditor(s).

WHEREFORE, the Trustee moves the Court to inquire into the above objections, deny confirmation of this Debtor's(s') Plan and to dismiss the case; or, in the alternative, convert the case to one under Chapter 7.

January 7, 2021

/s
K. Edward Safir, Attorney
for Chapter 13 Trustee
GA Bar No. 622149

R20-41834-BEM

CERTIFICATE OF SERVICE

This is to certify that on this day I caused a copy of the foregoing pleading to be served via United States First Class Mail, with adequate postage thereon, on the following parties at the address shown for each:

DEBTOR(S):

ANGELA K. CHAMBERS
10 BROTHERS LN
APT 1018
DALTON, GA 30720-7350

I further certify that I have on this day electronically filed the pleading using the Bankruptcy Court's Electronic Filing program, which sends a notice of this document and an accompanying link to this document to the following parties who have appeared in this case under the Bankruptcy Court's Electronic Case Filing program:

SAEGER & ASSOCIATES

This 7th day of January, 2021

/s/
K. Edward Safir, Esq.
Standing Chapter 13 Trustee
GA Bar No. 622149